

Instituto Puertorriqueño/Hispano Para Personas Mayores*Institute for the Puerto Rican/Hispanic Elderly*

105 East 22nd Street — Room 615

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Suleika Cabrera Drinane*Executive Director*

December 10, 1997

Cynthia L. Johnson

Director

Cash Management Policy and Planning Division

Financial Management Service

U.S. Department of the Treasury

Room 420

401 14th Street S.W.

Washington, D.C. 20227

RE: Proposed 31 CFR Part 208

Dear Ms. Johnson:

The following materials are the testimony of Suleika Cabrera Drinane, Executive Director of the Institute for the Puerto Rican/Hispanic Elderly, Inc. regarding the above.

HELLO! I AM SULEIKA CABRERA DRINANE, EXECUTIVE DIRECTOR OF THE INSTITUTE FOR THE PUERTORICAN/HISPANIC ELDERLY INC., THE LARGEST AND MAJOR NONPROFIT ORGANIZATION SERVING HISPANIC AND OTHER ETHNIC/RACIAL MINORITY ELDERLY IN NEW YORK CITY AND ENVIRONS. I MUST SAY THAT EFT 99 DOES NOT SIT WELL WITH ME. I SEE CONSIDERABLE HARDSHIP FOR MILLIONS OF SENIORS, COMPOUNDING THEIR DIFFICULTIES WITH THEIR SURVIVAL AND SUBSISTANCE. WHILE WE ARE PROCEEDING DEEPER INTO AN ELECTRONIC AGE, HOPEFULLY WE ARE NOT LEAVING AN

EFT
#108

AGE OF HUMANITY BEHIND.

A VERY LARGE PERCENTAGE OF HISPANIC AND OTHER ETHNIC/RACIAL MINORITY SENIORS DO NOT HAVE GOOD ENGLISH-LANUGAGE SKILLS, OR HIGH LEVELS OF EDUCATION. BECAUSE OF THEIR HARD LIVES THEY ARE OFTEN AT RISK AT AGE 60, WITH MORE THAN ONE CHRONIC DISEASE. A LARGE NUMBER ARE FRAIL, DISABLED AND HANDICAPPED, WITH MANY LIVING ALONE IN RELATIVELY UNSAFE NEIGHBORHOODS. THEY DO NOT WANT TO WANDER TOO FAR FROM HOME, FEARFUL OF CRIME. THEY ARE NOT GOOD CANDIDATES FOR PARTICIPATION IN THE ELECTRONIC AGE. FURTHER, THEY ARE POOR OR NEAR POOR, IN POVERTY AND NEAR POVERTY, DEPENDING LARGELY ON SOCIAL SECURITY PAYMENTS AND SUPPLEMENTARY SECURITY INCOME (SSI), FOOD STAMPS, FOR THEIR SUBSISTANCE AND SURVIVAL. THEY CANNOT AFFORD MORE EXPENSES, AND EVERY DOLLAR COUNTS. EVEN WITH THOSE BENEFITS THEY MUST PAY 40% OR MORE OF THEIR INCOME FOR RENT, AND 20% OF THEIR INCOMES FOR OUT-OF-POCKET MEDICAL COSTS.

WHILE THE EFT 99 PLAN, ON ITS OWN AND WHEN AND IF COMBINED WITH THE STATE'S EFT, MAKE SOME PROVISIONS FOR ACCESS TO MINIMAL BANK ACCOUNTS THEY MUST ESTABLISH, OR TO ETAs (ELECTRONIC TRANSFER ACCOUNTS TO BE ACCESSED THROUGH ATMs (AUTOMATIC TELLER

MACHINES), THOSE PROVISIONS DO NOT MAKE ANY SENSE FOR A VERY LARGE NUMBER OF SENIORS, AND THEY IMPOSE SERIOUS HARDSHIPS AND BARRIERS THAT ARE PLAINLY INHUMANE. HOW MANY FRAIL, SICK, DISABLED AND HANDICAPPED, VERY OLD, SENIORS CAN TRAVEL MANY BLOCKS IN EXTREMELY COLD WEATHER, ON RAINY DAYS, IN EXTREME HEAT? HOW MANY, WITH POOR ENGLISH SKILLS, BAD EYESIGHT, FEAR OF ELECTRONIC GADGETS, FEAR OF TRAVELLING IN CRIME RIDDEN NEIGHBORHOODS, AND WITH FEAR OF BEING EASY TARGETS FOR PREYING CRIMINALS WHO WATCH ATMs AND THE ELDERLY AT BANKS, WILL BE ABLE TO COPE WITH EFT 99?

NOW, WAIVERS ARE PROVIDED AND CONSIDERED IN EXTREME CASES THAT ENABLE SENIORS TO RECEIVE THEIR BENEFITS AND PAYMENTS BY MAIL. GOVERNMENT MATERIALS MAKE IT SOUND LIKE A SMALL NUMBER, WHEN THERE ARE VERY LARGE NUMBERS OF HISPANIC AND OTHER ETHNIC/ RACIAL MINORITY SENIORS WHO CANNOT EASILY TRAVEL LONG DISTANCES (LONG DISTANCES TO THEM), OR MANAGE ATMs, OR CONTROL THEIR ANXIETIES. WAIVERS MUST BE PROVIDED TO THEM TOO.

IF BANKS CHARGE SENIORS FOR OPENING SMALL BANK ACCOUNTS, FOR ACCESS TO ATMs, FOR ACCESS TO THEIR ACCOUNTS OR ATMs FOR SMALL WITHDRAWALS, THEN GOVERNMENT IS IN EFFECT THROWING PROFIT-

MAKING BUSINESS TO BANKS AT THE COST OF SENIORS. THE COSTS TO SENIORS WILL FREE GOVERNMENT MONEY NOW SPENT ON HANDLING SOCIAL SECURITY CHECKS IN CURRENT WAYS. THE GOVERNMENT COMES OUT AHEAD, THE BANKS COME OUT AHEAD, AND THE SENIORS WITH NO MONEY TO WASTE PICK UP THE BILL. THUS, JOINING INHUMANE PLANNING WITH ADDITIONAL OUT-OF-POCKET COSTS, THE GOVERNMENT HAS COME A LONG WAY IN TAKING CARE OF ITS OLD AND INFIRM.

THE INSTITUTE DOES NOT FEEL THAT THE RAPID MOVEMENT INTO A COMPUTERIZED AGE WILL CHANGE. IT DOES FEEL THAT MUCH MORE THOUGHT AND PLANNING MUST BE DONE TO CONSIDER AND OVERCOME THE SERIOUS FLAWS IN THE EFT 99 PLAN. BE HUMANE. PUT THE PROBLEMS AND NEEDS OF THE ELDERLY BEFORE THE PROFITS OF BANKS AND THE SMALL SAVINGS TO GOVERNMENT. THE POTENTIAL PROBLEMS RESULTING FROM THE EFT 99 AS NOW STATED COULD EASILY COST IN TERMS OF LABOR AND MATERIALS, IN CORRECTIVE ACTIONS AND EMERGENCY CARE, FAR MORE THAN IT HOPES TO SAVE.

THANK YOU.

I hope that the Department of the Treasury seriously considers the numbers of Hispanic and other ethnic/racial minority seniors receiving or soon to be receiving Social Security payments and other federal or state benefit payments or entitlements, their problems, needs and barriers to easy access or utilization of electronic transfers, and their inability to pay bank fees without

impacting their survival and subsistence, if and when it implements its Plan.
Miscalculations or false assumptions by Treasury could result in very costly corrective action
possibly costing more than any savings from applying the Plan too generally.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suleika', with a long, sweeping horizontal line extending to the right.

Suleika Cabrera Drinane
Executive Director

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ALL ABOUT THE INSTITUTE FOR THE PUERTO RICAN/HISPANIC ELDERLY, INC.

The Institute is the major and largest Hispanic nonprofit organization serving the Hispanic and other ethnic/racial minority seniors in New York City and environs. Founded in 1978, incorporated in 1979 in the State of New York as a nonprofit organization under IRS Code Section 501 (c)(3). Under the leadership and guidance of its Founding Executive Director, Suleika Cabrera Drinane, it grew from a small two-contract provider to a large multi-program/services city-wide umbrella operation, and part of local, state and national networks of agencies and organizations serving the elderly. It has broad affiliations. It is used as a resource by other providers and government agencies. It currently provides direct services to 15,000 seniors a year, and informational/referral services to another 125,000 annually. The Institute is part of the planning boards and committees of government and private agencies. It established the Hispanic Senior Action Council, now with 3,000 members, to prepare seniors for self-help and advocacy. The Institute publishes a quarterly, "El Pregonero", a "Directory of Service Providers To The Hispanic And Other Ethnic/Racial Minority Elderly", and "Recortes", a monthly compilation of newspaper clippings. The Institute's mission is to improve the quality of life of Hispanic/minority seniors, to advocate in their behalf, to help them to access and seize both established and new opportunities for their advancement, to provide programs and services within an environment of bilingual/bicultural responsiveness and ethnic/racial harmony.

The Institute in its current 22 funded programs (government contracts and foundation project grants) serves the elderly in many ways: (1) it reaches out citywide to identify them, inform them of their rights and entitlements, benefits and services, assists them in acquiring same (Social Security, Medicare, Medicaid, Public Assistance/Temporary Assistance To Needy Families, Food Stamps, EPIC, Supplemental Security Income - SSI, etc.); (2) it provides counseling, case management, assistance, referral, and information to them; (3) it provides technical assistance and information to Hispanic and non-Hispanic service providers; (4) it provides culturally responsive training to other providers and government agencies; (5) it provides home attendant services (Institute Home Care, subsidiary); (6) it rehabs housing for affordable permanent housing for homeless elderly (El Cemi Houses); (7) it delivers services to the homebound; (8) it has a Bilingual "Hot Line" for emergency calls and walk-ins which serves over 50 immediate problem areas of needs for assistance; (9) it operates and manages the Leonard Covello, the Elmhurst/ Jackson Heights, the UPACA Houses, the James Monroe

Senior Citizen Centers, and works closely with a large number of centers citywide in a complex outreach and service system; (10) it holds conferences workshops, seminars and lectures (i.e., the Annual Conference For The Hispanic Elderly, which draws at least 2,000 seniors at Ferris Booth Hall at Columbia University and at the Manhattan Community College's Tribeca Theater For The Performing Arts); (11) it represents the seniors at government hearings, gives testimony; (12) it places Hispanic Access Workers in the boroughs to work with senior centers and groups to provide local outreach and referral, counseling and case management, to increase local center memberships, and to assist them with programming; (13) it publishes informational materials; (14) it helps the Hispanic Senior Action Council to build strong self-help services and an effective advocacy force; (15) it provides subsidized on-the-job training; (16) it also addresses through Institute programs and services citywide Immigration and Naturalization, Crime Victims and Witnesses, Domestic Violence, Elder Abuse, HIV/AIDS, English-As-A-Second Language, Citizenship Application and Filing assistance; (17) it plans and delivers a broad variety of socio-cultural events and activities for seniors, such as the Three Kings Day Celebration, the Valentine's Day Dance, outings; All are ongoing.

The Institute is a member of many networks and groups of providers (i.e., Council of Senior Citizens and Centers, Federation of Protestant Welfare Agencies, New York Women's Agenda, SSI Advocacy Group, Hispanic Federation of NYC, etc.), and it collaborates with numerous providers. The Institute brings together action coalitions of provider agencies, as a developmental and motivational force in the aging network. The Institute serves both individual seniors and senior centers/groups in the Metropolitan New York City Area. It works closely with government agencies, local, state and federal.

There is another side of the Institute which requires constant and broad involvement; the involvement of local human and organizational resources citywide in service delivery and the dissemination of information. The truth is that large numbers of minority seniors are not informed, or are poorly informed, about rights and entitlements for which they may qualify, or of changes in laws or policy that affect them. Others, though aware, cannot gain access to opportunities because of cultural and language barriers, or the failures of providers to reach them. They need help, and the Institute responds in many ways.

Deep and broad community links must be established to communicate the information to the Hispanic and other minority elderly. The Institute constantly expands its links to local senior centers, community boards, churches, other groups, locally based aging providers and networks, to help it locate, inform, counsel and assist seniors in need, through Institute programs and professionals, or through referral to other providers with followup. Local seniors must be drawn into socio/cultural activities, advocacy, and leadership training, to develop self-confidence and self-help skills. Involvement is the key to social action, leadership development, enlightenment and empowerment.